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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE PALLMEYER

MAGISTRATE JUDGE KEYS

UNITED STATES OF AMERICA)

No. 08 CR 480

v.)

Violation: Title 22, United States Code,
Section 2778(b)(2)

UGUR YILDIZ)

FILED

COUNT ONE

JUL 16 2008

The SPECIAL MARCH 2007 GRAND JURY charges:

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

1. The Arms Export Control Act ("AECA"), Title 22, United States Code, Section 2778(a)(1), in pertinent part authorizes the President of the United States to control the import and export of "defense articles," and further authorizes the President to designate those items which shall be considered as "defense articles."

2. Pursuant to this authorization, the President has designated defense articles to include, among other things:

"Nonautomatic and semi-automatic firearms to caliber .50 inclusive (12.7mm); fully automatic firearms to .50 caliber inclusive (12.7 mm); combat shotguns (this includes any shotgun with a barrel length less than 18 inches); silencers, mufflers, sound and flash suppressors; riflescopes manufactured to military specifications; barrels; cylinders, receivers (frames) or complete breech mechanisms."

Title 22, Code of Federal Regulations, Section 121.1(Category 1) ("Firearms, Close Assault Weapons and Combat Shotguns").

3. The AECA, Title 22, United States Code, Section 2778(b)(2), further provides that no defense articles designated by the President may be exported or imported without a license for such export or import.

4. Title 22, United States Code, Section 2778(c) further provides that a person who willfully violates any provision of Title 22, United States Code, Section 2778, or any rule or regulation issued thereunder, commits a criminal violation.

5. From approximately April 15, 2006, to on or about June 15, 2006, inclusive, in the Northern District of Illinois, Eastern Division,

UGUR YILDIZ,

defendant herein, willfully exported certain firearms qualifying as defense articles without a license for such export, namely:

- (a) a 9mm, Magnum Research, Baby Eagle handgun, serial number 34307020 ;
- (b) a .50 caliber, Magnum Research, Desert Eagle pistol, serial number 33203349;
- (c) a 9mm, Glock, model 17 pistol, serial number FXL587;
- (d) a .45 caliber, Glock, model 21 pistol, serial number FVZ099;
- (e) a 9mm, Walther, model P1 pistol, serial number 118586W680;
- (f) a .45 caliber, H&K, model USP45 pistol, serial number 29-025798;
- (g) a .22 caliber, Browning, Buckmark pistol, serial number 655PR15284;
- (h) a .22 caliber, North American Arms, model NAA22 revolver, serial number L062765;
- (i) a .38 caliber, Taurus, model 82 revolver, serial number XC180424;
- (j) a .45 caliber, Glock, model 36 pistol, serial number FSH848;
- (k) a 9mm, Vulcan, Mac-9 machine pistol, serial number G5087;
- (l) a .38 caliber, Taurus, model 82 revolver, serial number XC180387;
- (m) a .38 caliber, Taurus, model 82 revolver, serial number XC180388;

- (n) a .38 caliber, Taurus, model 82 revolver, serial number XC180390;
- (o) a .38 caliber, Charter Arms, Undercover model revolver, serial number 40537;
- (p) a .38 caliber, Smith and Wesson, model 64 revolver, serial number 1D7756;
- (q) a .357 caliber, Taurus, model 608B6 revolver, serial number UG896548;
- (r) a .38 caliber, Taurus, model 82 revolver, serial number XC180380;
- (s) a .40 caliber, Taurus, model PT100 pistol, serial number SUC32000;
- (t) a .40 caliber, Taurus, model PT100 pistol, serial number SVF18152;
- (u) a 9mm, Beretta, model 9000S pistol, serial number SZ016249;
- (v) a .45 caliber, API Armscor, model 1911-A1 pistol, serial number AP241298;
- (w) a .357 caliber, SIG SAUER, model P239 pistol, serial number SA462753;
- (x) a .45 caliber, Ruger, model P90 pistol, serial number 66235299;
- (y) a .45 caliber, SIG SAUER, model P220 pistol, serial number G356331;

In violation of Title 22, United States Code, Section 2778(b)(2).

FORFEITURE ALLEGATION

The SPECIAL MARCH 2007 GRAND JURY further charges:

1. The allegations contained in Count One of this Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 28, United States Code, Section 2461(c).

2. As a result of his violations of Title 22, United States Code, Section 2778(b)(2), as alleged in Count One of the foregoing Indictment,

UGUR YILDIZ,

defendant herein, shall forfeit to the United States, pursuant to Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offenses.

3. The interest of the defendant subject to forfeiture pursuant to Title 28, United States Code, Section 2461(c), includes:

(a) a 9mm, Magnum Research, Baby Eagle handgun, serial number 34307020 ;

(b) a .50 caliber, Magnum Research, Desert Eagle pistol, serial number 33203349;

(c) a 9mm, Glock, model 17 pistol, serial number FXL587;

(d) a .45 caliber, Glock, model 21 pistol, serial number FVZ099;

(e) a 9mm, Walther, model P1 pistol, serial number 118586W680;

(f) a .45 caliber, H&K, model USP45 pistol, serial number 29-025798;

(g) a .22 caliber, Browning, Buckmark pistol, serial number 655PR15284;

(h) a .22 caliber, North American Arms, model NAA22 revolver, serial number L062765;

(i) a .38 caliber, Taurus, model 82 revolver, serial number XC180424;

(j) a .45 caliber, Glock, model 36 pistol, serial number FSH848;

(k) a 9mm, Vulcan, Mac-9 machine pistol, serial number G5087;

(l) a .38 caliber, Taurus, model 82 revolver, serial number XC180387;

(m) a .38 caliber, Taurus, model 82 revolver, serial number XC180388;

(n) a .38 caliber, Taurus, model 82 revolver, serial number XC180390;

(o) a .38 caliber, Charter Arms, Undercover model revolver, serial number 40537;

(p) a .38 caliber, Smith and Wesson, model 64 revolver, serial number 1D7756;

(q) a .357 caliber, Taurus, model 608B6 revolver, serial number UG896548;

(r) a .38 caliber, Taurus, model 82 revolver, serial number XC180380;

(s) a .40 caliber, Taurus, model PT100 pistol, serial number SUC32000;

(t) a .40 caliber, Taurus, model PT100 pistol, serial number SVF18152;

(u) a 9mm, Beretta, model 9000S pistol, serial number SZ016249;

(v) a .45 caliber, API Armscor, model 1911-A1 pistol, serial number AP241298;

(w) a .357 caliber, SIG SAUER, model P239 pistol, serial number SA462753;

(x) a .45 caliber, Ruger, model P90 pistol, serial number 66235299;

(y) a .45 caliber, SIG SAUER, model P220 pistol, serial number G356331;

All pursuant to Title 28, United States Code, Section 2461(c).

A TRUE BILL:

F O R E P E R S O N

UNITED STATES ATTORNEY